

We, A.R.C.A., are in total opposition to portions of RM-9267 wherein the PMRS Proposes use of the 420-430 Mhz .and 440-450 Mhz..

A.R.C.A. has been active as a facilitator for VHF and UHF operation for over 25 years and have supported our members in expanding the coverage of communications systems throughout the state for the purpose of providing better communications during emergencies. The amateur radio operators of Arizona through their membership in R.A.C.E.S. (Radio Amateur Civil Emergency Service) and their Clubs Emergency services have performed **Tens of Thousands** of public service hours within their communities. Search and Rescue units of the Counties of the State of Arizona all use Amateur Radio services on a regular basis both in training and during actual searches. The most recent uses during emergencies has been during flood watch (yes, Arizona has flash floods) and the last 2 major earth quakes in California. There are many other times that local emergencies have benefited by the use of amateur radio.

The Amateur Radio repeater and remote base owners in the State of Arizona use the 420- 430 Mhz. Spectrum for duplex linking and operation control for their communications systems that operate in other spectrum. Arizona currently has coordinated over 160 point to point links. Most of these links are duplex using a 5 Mhz. frequency split. These link systems are high performance systems composed minimally of two receivers and two transmitters with duplexers, isolators, power supplies and Antennas.

The above data refutes the petitioner's conclusion.

The 420-450Mhz. Spectrum in question is shared spectrum. Amateur radio has shared these frequencies with the U.S. Government. The amateur service is on a secondary basis. The petitioner suggests that amateur service should remain on a secondary basis but fails to explain how similar communications systems could coexist where the Petitioners business is making money and the amateur service is providing emergency service systems and earns no money from its service. The petitioner states in their own words that this sharing will not work " The co-existence of PMRS a CMRS systems in a single allocation will inevitably lead to one result , the eventual elimination of the PMRS users on those bands. In this case Amateur Radio would be eliminated in favor of PMRS. We find the petitioner offer to share to be without merit.

The petitioner also fails to point out that their existing spectrum could be more efficiently used if they were to change channel spacing within their existing spectrum . Splitting 25khz.channels into 12.5khz channels in their existing allocations would nearly double the existing channels available. This is existing technology and it could be implemented today.

The Petitioner has also failed to point out to the Commission that other regulatory changes could be made to provide for a new low power system to address Los Angeles Harbor problems such as usage of unused spectrum in the 220 222 MHz area or spectrum

could be allocated from the TV channels 60-69 currently being reallocated by the Commission.

The petitioner doesn't address the economic impact to the Amateur Radio Operations. The assumption is they (the Amateur Radio Operators) did it once, therefor they could Do it again. The estimated costs, excluding engineering for additional sites, range From \$20,000 - 30,000 for the remote base system plus \$10,000 -20000 per pair of Links. This figure doesn't include any labor necessary to convert to new spectrum. Additional costs will be incurred by our users to replace their own equipment. This also could run in the thousands of dollars.

A.R.C.A respectfully requests that the Federal Communications Commission **deny** **Petition RM-9267** and that the FCC demand that the Land Mobile Communications Council **not** refile until they have done everything possible with todays technology to Use the spectrum already assigned for their use with greater efficiency.

Respectfully submitted



Ralph S. Turk, Chairman
AMATEUR RADIO COUNCIL OF ARIZONA
Frequency Coordination Committee

RECEIVED

MAY - 2 1998

E. FORREST BOYD JR., A.B., M.D.
KB6FNW
P.O.B. 368-LA CANADA, CA
91012-0368

DOCKET FILE COPY ORIGINAL

28 MAY 98

TO: **FEDERAL COMMUNICATIONS COMMISSION
SECRETARY OF THE FCC
WASHINGTON, D.C. 20554**

REF. RM-9267

Dear Secretary and Commission,

(Due to the brief warning time, vacation and work—this is delayed.)

For more than a decade I have enjoyed amateur radio. As a physician I and my friends have been able to share medical advice regarding patients, participate in Disaster Preparedness and react in emergency situations. Also, I have enjoyed being involved as the founder of the La Canada Public Emergency Radio Communications Service, a co-founder of the Southern California Kaiser Hospital Disaster Net, a member of the Los Angeles County Disaster Communications Service, and assisting in Health and Welfare Communications for the Shriners Hospital for Children, (many separated for the first time from families and friends in their home areas), Special Olympics and parades etc.

The use of the 440 Band has not only been helpful, but at times critical, in my experience with amateur radios viz.: repeater linking, repeater controls, backup for other situations, etc. I have never experienced any problem sharing this frequency spectrum with the Department of Defense as primary user. As I understand the RM-9267, it would seem that there is a very real probability of the loss of this spectrum for the above mentioned civilian support and protection.

I sincerely trust that the financial motivation will not obviate humanitarian and altruistic capability.

Respectfully and sincerely,


E. Forrest Boyd Jr., M.D. KB6FNW

CC: #4

radio-FCCltr-440 band—may98

5
OET

RECEIVED

MAY - 1 1998

DONALD R. HLINSKY
4728 SARATOGA AVE.
DOWNERS GROVE, IL. 60515-3535

DOCKET FILE COPY ORIGINAL

May 28, 1998

Secretary
Federal Communications Commission
1919 M St. NW
Washington, DC 20554

SUBJECT: COMMENTS ON RM-9267

I am an Amateur, Extra Class Radio Operator (N9IZU) and hold a Commercial General Radiotelephone license (PG-18-33283). For the past twenty-five years, I have worked as an engineer in various wireless communications fields including radio broadcast, two-way, and both private and commercial paging. Having had exposure to the various issues raised by the Land Mobile Communications Council (LMCC) in RM-9267, I believe that I am qualified to offer the following comments on behalf of the Amateur Radio Service.

While I empathize with the LMCC's position that their members need efficient, congestion-free communications, I find that their proposed request for a primary allocation at 420-430 and 440-450 MHz ("70cm band") to be extremely damaging to the Amateur service. Amateurs use their 70cm band allocation for many purposes including fast scan TV, weak signal work, moonbounce, data backbone circuits and local FM voice communications. While all of these modes are used to support Amateur hobby and experimental communications, FM, TV, and data modes are also used for the emergency communications aspects of the service. All of these activities would be dramatically and adversely affected by the reallocation of primary status from Government to Business and Public Safety ("Professional") interests. While the LMCC has indicated that, "Amateur applications ... should remain secondary to PMRS" they present no technical support for this statement. My experience and indeed LMCC's experience, as detailed throughout their petition, with channel sharing is that it is problematic at best. The Amateur service does not utilize its frequency allocations in the same way as the Professional services. This usage disparity would result in the Amateur service being forced from the band as the Professional users moved in. Consequently, I believe that admitting Professional communications to the 70cm band would effectively destroy the Amateur use of this band.

Points for consideration regarding Amateur and Professional sharing:

- The LMCC states in their Petition that, "Time sharing of channels in a given geographic area is very spectrum efficient for multiple small users, but only when their modes of operation and technology use are quite similar." In view of this assessment, Amateur use of the 70cm band is not compatible with professional users since the modes of operation are not at all similar to that practiced by the Professional services. In addition, many Amateur applications in the 70cm band are "channelized" according to "band plans" adopted by the Amateur community. However, many other applications are not channelized to allow Amateurs the freedom to experiment and communicate within the scope of Part 97 rules. These non-channelized communications are incompatible with, and would cause interference to Professional services where channelization is required. Consequently, as a secondary service, Amateurs would have to give up non-channelized operations to eliminate interference to the Professional services. As a result of these mode and technology differences, Amateurs would not be able to share the 70cm band without interfering with Professional users.

4

OET

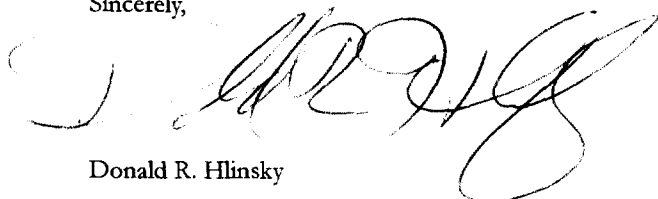
May 29, 1998

- The LMCC's discussion regarding the usage of various bands does not address what types of services would be permitted if the 70cm band were reallocated. One can presume that the LMCC members would prefer to have no restriction placed on their use of the band. Consequently, high "duty-cycle" modes such as digital paging, mobile data, and even trunked services would likely be employed. These modes dominate their assigned channels and do not lend themselves well to airtime sharing. Here again, Amateurs would be forced from the band due to incompatibility of non-similar technologies and modes.
- Amateurs frequently provide emergency and other public service communications on an ad-hoc basis. Often these services are set up under demanding conditions, occupy spectrum intensely for hours or days, and are then taken down when normal services are restored. The Amateur 70cm band is often used to provide local communications during these situations. Should the band be allocated to Professional services, it is reasonable to assume that those services would be most active under emergency conditions. Since effective sharing could not be done even under normal circumstances for the reasons cited above, it is unreasonable to assume that the situation would be better under emergency conditions. As a result, Amateurs would be unable to use the 70cm band to provide their often-lauded public service communications to their communities.

I believe that the LMCC has valid service quality concerns. However, I most emphatically do not believe that, what in my view is a "quick fix solution" to their problem, is in the overall best interests of the general public and Amateur radio. Amateurs use the 70cm band to support their, "...service to the public as a voluntary noncommercial communication service, particularly with respect to providing emergency communications", as stated in Part 97.1a in addition to other "hobby" aspects of the service. The LMCC has not demonstrated that Amateurs would be able to continue to use this band for any purpose, let alone critical emergency communications. While I also empathize with the LMCC's comments regarding the expense of building and maintaining wireless communications systems, Amateurs do not typically have the financial resources of the companies and public safety agencies represented by LMCC members. Consequently, it would be far more difficult for Amateurs to recover from the loss of the 70cm band than it would be for those represented by the LMCC to invest in other technologies.

In summary, I believe that the LMCC's petition and proposals for the 70cm band contained therein are extremely damaging to the Amateur service while providing only a "quick-fix" for a problem that requires a more thoughtful and sound solution. I respectfully request that the Commission dismiss this and any requests for reallocation of any Amateur frequencies, shared or exclusive, to any Commercial, Public Safety, or other non-governmental services.

Sincerely,



Donald R. Hlinsky

Cc: Mr. David Sumner - ARRL

DOCKET FILE COPY ORIGINAL

Before the

FEDERAL COMMUNICATIONS COMMISSION

Washington, D.C. 20554

RECEIVED

JUN 1 1998

FCC MAIL ROOM

In the Matter of)
)
An Allocation of Spectrum for)
Private Mobile Radio Services) RM-9267
)

To: The Secretary,
Federal Communications Commission

STATEMENT OF OPPOSITION TO RM-9267

I am writing in opposition to the Land Mobile Communications Council's proposal to re-allocate the 420-430 MHz and 440-450 MHz frequency spectrum to commercial, private, land mobile applications. Instead, I ask that the Commission change the Amateur allocation from secondary to co-primary with the U.S. government. Prior to the Cold War era, the Amateur Radio Service was a primary status user of these frequencies. With the tremendous success of the modern "no code" Technician license and the high growth of Amateur UHF operations, now is the time to restore Amateur Radio's historic primary status within the 420-450 MHz band.

The 420-450 MHz Amateur allocation is the second most used Amateur VHF/UHF band. The LMCC has requested "sharing" this band with Amateur operations yet provides no explanation for how "sharing" might occur. Based on the history of "sharing" with commercial services (particularly the example of AVL companies "sharing" 902-928 MHz who ordered hams off the air), "sharing" means that Amateur operations will be evicted from the band. This is what happens when commercial, for profit services "share" with not-for-profit, community service oriented Amateur Radio operations.

Amateur Radio has and will continue to share its VHF/UHF allocations with *mutually compatible* services and operations. These have included, the U.S. government, the U.S. military, NOAA doppler wind shear radar and other government radiolocation services. Amateur Radio has a long and proud history of supporting the U.S. armed forces and NOAA through the National Weather Service's SkyWarn system. For these reasons, there is a *mutual interest in sharing between compatible services* like Amateur Radio and the U.S. government. However, there are *no mutual interests* in common with for-profit private

No. of Copies rec'd
List A B C D E

5

089

land mobile services; "sharing", as in the AVL example, will result in the loss of 420-430 and 440-450 MHz by the Amateur service, which will prove devastating to the mission of the Amateur Radio service.

Many government agencies and non-profit disaster relief organizations would be tremendously harmed by the loss of the Amateur 420-430 and 440-450 MHz allocations. Private and for-profit radio services do not have mutually compatible interests with the Amateur Radio Service. Sharing between private land mobile and the Amateur Radio Service, as proposed by the LMCC, will not work. The 420-450 MHz band is the second most used VHF/UHF Amateur Radio allocation. The loss of these frequencies will cause severe disruption to the mission of Amateur Radio, as specified in C.F.R. Title 47 Part 97.1, and will render severe harm to the Amateur's ability to support numerous government and non-profit relief agencies.

I respectfully request that you DENY the request of the LMCC to share the Amateur radio allocations at 420-430 and 440-450 MHz. Instead, I request that the Commission restore Amateur Radio's historic co-primary status in the entire band 420-450 MHz.

Sincerely,

A handwritten signature in black ink, appearing to read "Jon Andrews", with a long horizontal flourish extending to the right.

Jon Andrews (K1IMD)

1365 Donna Drive

Mattituck, New York 11952

May 25, 1998

WESTERN INTERTIE NETWORK

2040 W. Hawley Drive, Vista, CA 92084

Phone: 760/ 724-4020 Fax: 760/ 941-1601

May 15, 1998

DOCKET FILE COPY ORIGINAL

Secretary
Federal Communications Commission
Washington DC, 20554

RE: RM 9267

Gentlemen,

It has come to our attention that the LMCC is demanding that you immediately reallocate most of the 420 to 450 MHz band presently in the amateur radio service. We strongly oppose any such action!

The 420 to 450 MHz amateur radio UHF band is the second most popular of the amateur radio services' VHF and UHF allocations. There are thousands of FM repeaters operating daily from 440 to 450 MHz, and a variety of modes on the air every day in the 420 to 430 MHz segment, including thousands of point to point links, and a very mature amateur television fraternity.

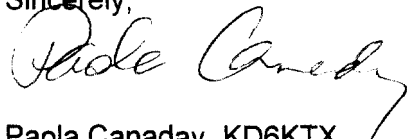
We at the Western Intertie Network (the WIN System) presently operate five high level UHF repeaters in the 440 to 450 MHz segment, covering from Southern Arizona to Central California, including all of the seven Counties of Southern California. We also operate ten point to point full duplex links.

Our group, the WIN System, has been affiliated with the San Diego County RACES emergency preparedness organization for years, and because of our wide area coverage, we have been able to handle innumerable pieces of emergency traffic during three major fires and two major earth quakes. It is impossible to estimate how many lives we have directly touched during emergencies, however, I am certain we have been a major communications force during these times of emergencies.

The WIN System also routinely operates many of our repeaters for public safety missions. Several times each year WIN System repeaters are used to handle communications at various Marathons, 10K runs, Bicycle Events, and Special Olympics Events for the handicapped. These public service communications activities would be impossible to achieve without the 440 MHz amateur band "wide area coverage" repeaters operated by the WIN System, and donated to public service.

We therefore strongly urge you to deny the demands of the LMCC. We as amateur radio operators continue to provide the above services free to the public. There is never a charge for either the 440 MHz repeater equipment, or the operators who donate their time and expertise during these times of public service. I do not think the LMCC would likewise provide such services free to the public. Their agenda is to make a profit from these frequencies, not to serve the public, free of charge, as is the amateur credo.

Sincerely,



Paola Canaday, KD6KTX
P. O. Box 390176
Anza, CA 92539-0176
(909) 763-0214

No. of Copies rec'd 5
List A B C D E OET

WESTERN INTERTIE NETWORK

2040 Hawley Drive, Vista, CA 92084

Phone: 760/724-4020 Fax: 760/941-1601

MAY 1 1998

May 15, 1998

DOCKET FILE COPY ORIGINAL

Secretary
Federal Communications Commission
Washington DC, 20554

RE: RM 9267

Gentlemen,

It has come to our attention that the LMCC is demanding that you immediately reallocate most of the 420 to 450 MHz band presently in the amateur radio service. We strongly oppose any such action!

The 420 to 450 MHz amateur radio UHF band is the second most popular of the amateur radio services' VHF and UHF allocations. There are thousands of FM repeaters operating daily from 440 to 450 MHz, and a variety of modes on the air every day in the 420 to 430 MHz segment, including thousands of point to point links, and a very mature amateur television fraternity.

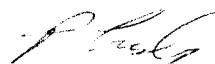
We at the Western Intertie Network (the WIN System) presently operate five high level UHF repeaters in the 440 to 450 MHz segment, covering from Southern Arizona to Central California, including all of the seven Counties of Southern California. We also operate ten point to point full duplex links.

Our group, the WIN System, has been affiliated with the San Diego County RACES emergency preparedness organization for years, and because of our wide area coverage, we have been able to handle innumerable pieces of emergency traffic during three major fires and two major earth quakes. It is impossible to estimate how many lives we have directly touched during emergencies, however, I am certain we have been a major communications force during these times of emergencies.

The WIN System also routinely operates many of our repeaters for public safety missions. Several times each year WIN System repeaters are used to handle communications at various Marathons, 10K runs, Bicycle Events, and Special Olympics Events for the handicapped. These public service communications activities would be impossible to achieve without the 440 MHz amateur band "wide area coverage" repeaters operated by the WIN System, and donated to public service.

We therefore strongly urge you to deny the demands of the LMCC. We as amateur radio operators continue to provide the above services free to the public. There is never a charge for either the 440 MHz repeater equipment, or the operators who donate their time and expertise during these times of public service. I do not think the LMCC would likewise provide such services free to the public. Their agenda is to make a profit from these frequencies, not to serve the public, free of charge, as is the amateur credo.

Sincerely,



Phillip Canaday, KN6AV
P. O. Box 390176
Anza, CA 92539-0176
(909) 763-0214

No. of Copies rec'd
List A B C D E

5
DET

WESTERN INTERTIE NETWORK

2040 Hawley Drive, Vista, CA 92084
Phone: 760/ 724-4020 Fax: 760/ 941-1601

May 15, 1998

DOCKET FILE COPY ORIGINAL

Secretary
Federal Communications Commission
Washington DC, 20554

RE: RM 9267

Gentlemen,

It has come to our attention that the LMCC is demanding that you immediately reallocate most of the 420 to 450 MHz band presently in the amateur radio service. We strongly oppose any such action!

The 420 to 450 MHz amateur radio UHF band is the second most popular of the amateur radio services' VHF and UHF allocations. There are thousands of FM repeaters operating daily from 440 to 450 MHz, and a variety of modes on the air every day in the 420 to 430 MHz segment, including thousands of point to point links, and a very mature amateur television fraternity.

We at the Western Intertie Network (the WIN System) presently operate five high level UHF repeaters in the 440 to 450 MHz segment, covering from Southern Arizona to Central California, including all of the seven Counties of Southern California. We also operate ten point to point full duplex links.

Our group, the WIN System, has been affiliated with the San Diego County RACES emergency preparedness organization for years, and because of our wide area coverage, we have been able to handle innumerable pieces of emergency traffic during three major fires and two major earth quakes. It is impossible to estimate how many lives we have directly touched during emergencies, however, I am certain we have been a major communications force during these times of emergencies.

The WIN System also routinely operates many of our repeaters for public safety missions. Several times each year WIN System repeaters are used to handle communications at various Marathons, 10K runs, Bicycle Events, and Special Olympics Events for the handicapped. These public service communications activities would be impossible to achieve without the 440 MHz amateur band "wide area coverage" repeaters operated by the WIN System, and donated to public service.

We therefore strongly urge you to deny the demands of the LMCC. We as amateur radio operators continue to provide the above services free to the public. There is never a charge for either the 440 MHz repeater equipment, or the operators who donate their time and expertise during these times of public service. I do not think the LMCC would likewise provide such services free to the public. Their agenda is to make a profit from these frequencies, not to serve the public, free of charge, as is the amateur credo.

Sincerely,



Howard Bassham, K6RYA
18727 Olmeda Place
San Diego, CA 92128
(619) 676-3314

Received 5
OCT